

CV 09 - 5735

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

DEBORAH SCROGGINS

Plaintiff,

- against -

RENEE SCROGGINS

VALERIE JEAN SCROGGINS

SOUL JAZZ RECORDS, LTD/UNIVERSAL SOUND

Defendants,

I. Parties:

Plaintiff DEBORAH SCROGGINS, resides at 544 Marcy Avenue, #3F,
Brooklyn, NY 11206.

Defendant RENEE SCROGGINS resides at 1114 Dunaway Drive,
McDonough, GA and c/o Enterprising Scroggins Girls Music, P.O. Box
1914, McDonough, GA 30253-1709.

Defendant VALERIE JEAN SCROGGINS resides at P.O. Box 1246,
Blakeslee, PA 18610-1246.

Defendant SOUL JAZZ RECORDS LTD./UNIVERSAL SOUND resides
at 7 Broadwick Street, Soho, London W1F 0DA England.

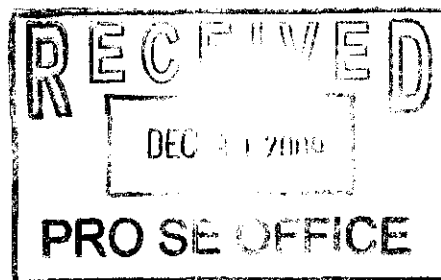
II. The jurisdiction of the Court is invoked pursuant to US Codes Title 17,
Chapter 5, § 501(a)(b), §504 a (1)(2), b,c,d, §505, §506 & §509. Title 28, chapter
87, §1400(a)(b), 15 U.S.C. §1125(a) and NYCVR 5-51.

III Statement of Claim is that In the late 1970's, my sisters and I formed a
band and co-wrote our own original songs. We were self taught
musicians and vocalists and also songwriters. After entering
numerous local talent shows, we were somewhat discovered by Ed

ORIGINAL CH. J.
DEARIE,

COMPLAINT
BLOOM, M.J.

JURY TRIAL DEMANDED



Bahlmann, owner of independent record label, 99 Records, who would team up with Tony Wilson of the UK who owned, Factory Records. In 1980 we recorded a six song EP on 99 Records and a 3 song 45" for Factory Records.

I was a 16 year old minor at the time of both recordings and up to today have never ever seen a dime of money from both record sales. I've never even received a copy of the 45" record that was recorded for Factory, and the only copy I had of the EP with 99 Records that I made went to the Library of Congress for copyright registration. Me, Renee and Valerie have never had a cordial relationship whereas we can sit down and discuss issues relating to these records and monies I've never received. Whereas Renee and Valerie have an excellent monetary relationship where Renee had took on all representation for Valerie for her share of royalties. Renee was the leader of the group and every time I'd ask her, where was the money that was owed to me over the years, she'll make up some excuse as to why I never gotten paid. I wind up through promises and coercion to make 2 more records with 99 Records and there also was a 12" disco version with 3 songs on it and a album with about 8 songs on that. Many years had passed and I still never received no royalties from any of the records I had made with 99 Records. They finally went defunkt in the late 80's and it seemed like a free for all. Our songs were already being sampled by other artists(rappers and singers) and my sisters seemed to be getting some residuals from these opportunities. This is what I heard by word of mouth and also checks I'd seen at my mom's house in the early 1990's. Time moved on and they continued playing shows and had already kicked me out of the band around 1987/88, so that I couldn't see the obvious, them getting money and keeping my share that I should have been getting. All along they kept my copies of the records I had made with 99 records, all 3 of them, the EP, the 12" disco version and the album.

Then in 2006, I had lunch with a long time fan and he showed me the re-release of a compilation of our original songs on Soul Jazz Records called: "A South Bronx Story". I was on the cover along with my sisters and no one even gotten my permission to do so. There were pics of me on the back cover, the inside sleeve and on the CD itself. I retrieve some info from the record and begin searching for person(s) responsible and contacted Soul Jazz Records by e-mail and told them that this was illegal to use my likeness, my music which I'm co-author without my permission, they never responded back. I also begun at that point to get as much useful info from the internet and that the music were used on collaborations with other artists albums and such and was also sampled by them as well over a period going back to at least 1988. But the more recent uses of the songs were in Films, TV

and commercials, within the last 2 to 3 years Soul Jazz Records were representing them and helped negotiate monies for uses of licensing the music without me being notified and without my permission and without payment for usage. I only got a few pennies from ASCAP from the viewing of the film and/or TV show on cable or TV viewing. I never was contacted when the negotiations went through for the initial upfront money payment for mechanical and master/sync usage. The songs also were used in commercials, TV and films. I also got some legal counsel who didn't help with my case and in fact they took a pay off to keep quiet. So I fired them and they were off the case. So that's why I begin to take the necessary steps to pursue my case pro se with the help from the Office of the Self Represented in Federal Court. Another thing I wanted to state was I still was and am getting pennies from ASCAP from these recordings and seen that my music was being used in Films, TV, and commercials in the US and abroad. I then requested for a Cue sheet, because someone had to pay for the upfront use of the music (mechanical and master/sync royalties) which I never gotten a dime for. The cue sheet I requested was from the film "Prime" and eventually contacted the music supervisor from the film, Jim Black, who I spoke with over the phone and by email, he eventually emailed me the paperwork for the sync licenses and my sis Renee was listed as sole writer, which is not the case and Soul Jazz Records rep Angela Scott acted as their agent who negotiated the deal for my sis Renee with no mention of myself as a writer.

My sister Renee had since contacted me in late 2007/08 and told me she wanted to work things out and I thought we would finally work this out and I would finally get my well over due money. But Renee came with her same old silly games and made up stories to get sympathy for her. She did tell me she now had possession of the original masters of the six song EP, which includes songs, Moody, UFO, You're no Good, ESG, Hey and Earn It! Around that time I had been working on getting my name on the copyright and Renee was the only one listed as sole writer. I had told Library of Congress(LOC) about my dealings with my sisters, Renee in particular, who was greedy for my money and selfish as well and had not included me on the original copyright. For the original to be amended, she would have to add me on and I know she wasn't going to do that, so they (LOC) told me to send in a duplicate registration as an original application. And after many many years I was finally granted a copyright for the same songs that she had registered. But on my application I listed Renee and Valerie and myself as the 3 original writers of all the songs on that EP as it should be. In these recent years, Renee Scroggins & Valerie Scroggins along with Soul Jazz Records have used songs co-authored by me in Films, TV, commercials and records in the US and abroad and also my

likeness on redistributed records of copyrighted material without my permission and consent and have never ever compensate me in no way, shape, form or fashion.

- IV The Relief I seek from Renee Scroggins and Valerie Jean Scroggins is money damages in the amount of Five million US dollars (\$5,000,000), fines and imprisonment for laws that were broken and violated and also the possession of the master tapes of ESG songs, which includes Moody, UFO, You're No Good, Hey, ESG, Earn It, Dance, Parking Lot Blues, etc. and/or shared credit usage of the master tapes and my attorneys fees paid for.

The relief I seek from Soul Jazz Records LTD/Universal Sound is money damages in the amount of Ten million US dollars (\$10,000,000), fines and imprisonment for laws that were broken and violated and my attorney fees paid for.

12-31-09
DATE

Deborah Scroggins
SIGNATURE

646-641-5837
TELEPHONE NUMBER